

Remarks

Upon entry of the foregoing amendment, claims 1-2, 4-6, 9-14, and 17-27 are pending in the application, with claims 1 and 23 being the independent claims. Claims 1, 22, 23, and 25 have been amended herein. New claims 26 and 27 have been added. Claim 16 has been cancelled. These changes introduce no new matter, and their entry is respectfully requested.

Based on the following remarks, Applicants respectfully requests that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Objections to the Claims

Applicants thank the Examiner for interpreting claim 23 as claiming all recited subject matter except the subject matter that was annotated with a strikethrough. Claim 23 is presented herein with only current amendments marked in the claim.

The Office Action objected to claims 1, 2, 22, 23, and 25 because of inconsistencies in the use of "fabric cleaning liquid" and "cleaning fluid." The claims have been amended herein to correct these inconsistencies by changing all instances of "cleaning liquid" to "cleaning fluid." Applicants therefore request withdrawal of the objections to claims 1, 2, 22, 23, and 25.

Rejections under 35 U.S.C. § 103

Claims 1, 2, 4-6, 9, 11, 14, and 17-21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,231,259 to Murgida et al. ("Murgida") in view of U.S. Patent No. 5,653,338 to Tani ("Tani") as further evidenced by U.S. Patent No.

3,896,822 to Zimmerman ("Zimmerman"). Claims 12 and 13 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Murgida in view of Tani, as further evidenced by Zimmerman and U.S. Patent No. 4,111,567 to Berghahn et al. ("Berghahn"). Claim 22 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Murgida in view of Tani, as further evidenced by Zimmerman and WO 97/12027 to Zhen ("Zhen"). Claims 10, 16, 23, and 24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Murgida in view of Tani, as evidenced by Zimmerman, and further in view of U.S. Patent No. 5,697,531 to Fattori ("Fattori"). Applicants respectfully traverse these rejections.

Present independent claims 1 and 23 each recite a dispensing device including first and second threaded shafts, wherein the second threaded shaft is fixed to a movable platform. Claims 1 and 23 further recite that the second threaded shaft is configured to rotate without rotating the movable platform and that the second threaded shaft is configured to move in an axial direction with the axial advancement of the movable platform. Neither Mugida, Tani, Zimmerman, Berghahn, Zhen, nor Fattori, taken alone or in combination, disclose such features. Specifically, neither Mugida, Tani, Zimmerman, Berghahn, Zhen, nor Fattori, taken alone or in combination, disclose a dispensing device wherein a threaded shaft fixed to a movable platform moves axially with the movable platform without also rotating the movable platform.

The Examiner admits that Mugida, Tani, and Zimmerman fail to disclose a second threaded shaft configured to rotate without rotating the moveable platform. See Office Action, page 9. However, the Examiner asserts that Fattori discloses this feature.

Specifically, the Examiner alleges that Fattori discloses a dispenser device including a threaded shaft 19 ("helical track") fixed to a movable platform 11 ("elevator cup"), wherein the threaded shaft is configured to rotate without rotating the movable platform. Office Action, p. 9. Applicants respectfully disagree. Fattori discloses that elevator cup 11 interfaces with elevator member 13, not helical track 19. Fattori, col. 6, ll. 9-11. Elevator member 13 has followers 15 formed thereon which interface with a serpentine path defined by helical track 19. Fattori, col. 5, l. 64 - col. 6, l. 3. In operation, rotation of thumb wheel 17 causes rotation of the helical track, thereby moving followers 15 "in a generally upward direction, causing the elevator member 13 to move upwardly...." Fattori, col. 6, l. 65 - col. 7, l. 6. Thus, Fattori discloses only that the helical track 19 rotates, but that elevator member 13, which is fixed to elevator cup 11, does not rotate. Moreover, helical track 19 merely rotates and does not axially move with axial advancement of elevator cup 11. Fattori therefore fails to cure the deficiencies of the other cited references, as Fattori fails to disclose a second threaded shaft fixed to a movable platform, "wherein the threaded shaft is configured (1) to rotate without rotating the movable platform and is configured (2) to move in an axial direction with the axial advancement of the movable platform," as recited in present claims 1 and 23 (numbering added).

Berghahn discloses a liquid applicator, and does not disclose a movable platform or threaded shafts. Thus, Berghahn does not remedy the deficiencies of Mugida, Tani, Zimmerman, and Fattori.

For at least the foregoing reasons, the cited references are deficient as references upon which to base a *prima facie* case of obviousness, and therefore claims 1 and 23 are patentable over the cited references.

Claims 2, 4-6, and 9-14, and 17-22, depend from and add features to claim 1, and are therefore patentable for at least the same reasons as claim 1. Claims 24 and 25 depend from and add features to claim 23, and are therefore patentable for at least the same reasons as claim 23. Claim 16 has been cancelled, rendering its rejection moot.

Establishment of a *prima facie* case of obviousness requires that the Examiner factually show that the references in combination disclose all of the elements of the claims in their proper function. In the present case, this burden has not been met. Applicants thus respectfully request that the Examiner reconsider and withdraw the rejections of claims 1-2, 4-6, 9-14, and 17-25.

New Claims 26 & 27

New dependent claims 26 and 27 are patentable for at least the same reasons as claims 1 and 23, respectively. Moreover, each of claims 26 and 27 recite "a device wherein the second threaded shaft has a distal end portion and a proximal end portion opposite the distal end, and wherein the proximal end portion engages with the first threaded shaft, and wherein the distal end portion contacts a bottom surface of the movable platform." None of the cited references discloses these features. Accordingly, Applicants respectfully request these claims be allowed.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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